

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Amendment of the Amateur Service
Rules Concerning the 222-225 MHz
and 1240-1300 MHz Frequency Bands
FEB 23 1993
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PR Docket 92-289

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COMMENTS ON PETITION FOR RULE MAKING

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

These comments are filed by the Northern California/Nevada DX Packet Spotting Network. These comments were originally filed with reference to RM-7869 in January, 1992. Our position remains the same on these issues.

The American Radio Relay League (ARRL) has filed a petition for rule making (RM-7869) which would create a subband in the 222.000 - 222.150 MHz segment of the 222 - 225 MHz band which would not be available for auxiliary link operation. These comments seek to influence the Commission in its action taken with reference to the subject subband.

The Northern California/Nevada DX Packet Spotting Network has attempted to follow generally accepted coordination practices in accordance with the self-regulating concept of the Amateur service. In addition, we have attempted to work with and through the ARRL in accomplishing needed coordinations. These comments offer a narrative of that attempt.

The "backbone" which ties the nodes in our network together was in the 220-222 MHz range which was recently removed from the Amateur Radio Service. When the Commission first proposed to remove those frequencies from the Amateur service, it also suggested in its proposal that it would be receptive to input from the Amateur community as to a revised band allocation plan with reference to repeaters and modes of operation. As a local survey showed support for the then existing ARRL "band plan" for 222 - 225 MHz, we contacted our

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ARRL Director and encouraged him to have the ARRL file at that time. We felt the ARRL should accept the Commission suggestion by asking that the ARRL band plan be enforced with appropriate rules. However, we were persuaded by our ARRL Director that we should "cool it" as any indication that a contingency band plan proposal was even being considered by the ARRL would weaken the ARRL position in its dealings with the Commission at that time.

When it was apparent that we would lose our backbone frequency, we contacted our ARRL Director and made the suggestion again. His advice was that the ARRL would not become involved and that coordinations must be accomplished locally without the involvement of the ARRL.

Based on that guidance, we worked with the coordinating bodies in Northern California and Nevada to obtain frequencies in the 222-225 MHz range for our Auxiliary link stations. The coordinating bodies orchestrated frequency moves by existing users of 222 - 225 MHz to free up frequencies in that range to accommodate our needs. Our Northern California interlink is now on 223.74 MHz, and our Nevada link is on 222.14 MHz. The frequency separation between our two interlinks is necessary to accommodate two colocated transceivers at the junction node, given the minimal signal level available on our knife-edge radio path between California and Nevada. This "weak signal" path uses the Sierra Nevada Mountains as the knife-edge for transmission.

We did not merely make a "simple frequency move" to follow the coordinators recommendations. We have also been obliged to replace one transceiver to mitigate problems caused by close channel spacing with another system (an FM voice repeater on 223.76 MHz), and we have been obliged to install another transceiver with highly directional antenna and cavity filter on our knife-edge link over the Sierra Nevada Mountains to Nevada. We have followed accepted practices in making these moves and felt secure in maintaining our network, even without the requested guidance of the ARRL.

Now, we learn that the ARRL has proposed to impose a band plan which would disenfranchise us from our 222.14 MHz auxiliary link frequency. Unfortunately, the ARRL has again not gathered full data on the present uses of a frequency range before it communicates with the Commission (Reference is made here to the ARRL's lack of knowledge of use of the 220-222 MHz range when it responded to the Commissions proposal to remove that frequency range from the Amateur Service). We would hope that the ARRL would quantify the numbers of Amateurs who would use the proposed 222.000-222.150 MHz segment, and exactly why 222.150 MHz should be the band segment edge rather than 222.100, 222.050, 222.125 or even 222.500 MHz.

We would hope the ARRL could explain why a new restriction should be added now, after all of the coordination activities, rather than prior to the extensive and expensive moves which have now taken place without their guidance. We are prepared to document with callsigns and dates of use over 1000 users of our DX Packet Spotting Network who utilize 222.140 MHz just here in Northern California/Nevada. We hope that the Commission would expect similar documentation from the ARRL to justify excluding us from that band segment. The ARRL did not ask us for any information on usage before it decided on the 222.150 MHz frequency. To the contrary, it rejected our requests for its action.

It appears that the ARRL proposal was prepared to counter a problem which exists in Southern California. A problem which perhaps would not have existed had the ARRL taken positive steps when it had the opportunity to do so. Now that a problem exists in Southern California, we suggest that the Commission not impose restrictions on the rest of the country to correct that localized problem.

We suggest that you should reject the ARRL proposal as it is ill considered and untimely. As most of the country has successfully accommodated the reallocation problem through

local coordinations, we suggest that you reject the ARRL proposal or at least obtain additional information from them which documents the present occupancy of the entire 222-225 MHz band and supports their choice of the frequency 222.150 MHz as the demarcation point for Auxiliary links and repeaters.

Should you proceed with the ARRL proposal, we suggest that you consider a rule which would allow the use of Auxiliary links between 222.100 and 222.150 MHz, perhaps with a limitation of 200 watts transmitter output power. This would accommodate our present, coordinated use of this frequency range. We feel it is highly unlikely that the present users of 222 ~ 225 MHz in our area would feel compelled to move again to accommodate us, and we ask your consideration of our needs.

As an aside, our use of this unusual "knife-edge" path also contributes to the state of the art. If we are forced to vacate this frequency in favor of one which is higher in the band (we can't just move up to the next channel as it is the first of the coordinated FM voice repeater input frequencies), we will no doubt experience problems with overload from nearby strong transmitters. This is the same problem the ARRL seeks to mitigate with its proposal. We feel that our weak signal 24 hour/day use of this frequency is at least as important as the less frequent "weak signal" operations the ARRL seeks to protect.

Your consideration of our comments is appreciated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jon E. Casamajor". The signature is fluid and cursive, with a large initial "J" and a trailing flourish.

Jon E. Casamajor, KN6EL
President,
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